

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

THE HEBREW UNIVERSITY OF JERUSALEM,
YISSUM RESEARCH DEVELOPMENT
COMPANY OF THE HEBREW UNIVERSITY
OF JERUSALEM LTD., BEN-GURION
UNIVERSITY OF THE NEGEV, B.G. NEGEV
TECHNOLOGIES AND APPLICATIONS LTD.,
THE WEIZMANN INSTITUTE OF SCIENCE,
and BAR ILAN UNIVERSITY,

Defendants.

Adv. Pro. No. 21-01190 (CGM)

STIPULATION AND ORDER

WHEREAS, on September 27, 2021, Irving H. Picard, as trustee (“Trustee”) for the liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. § 78aaa-lll, substantively consolidated with the chapter 7 estate of Bernard L. Madoff, by and through his undersigned counsel, filed a complaint commencing the

above-captioned action (“Complaint”) against The Hebrew University of Jerusalem, Yissum Research Development Company of the Hebrew University of Jerusalem Ltd., Ben-Gurion University of the Negev, B.G. Negev Technologies and Applications Ltd., The Weizmann Institute of Science, and Bar Ilan University (together, “Defendants,” and with the Trustee, the “Parties”), by and through their respective undersigned counsel, state as follows:

WHEREAS, counsel for the Trustee and undersigned counsel for the Defendants conferred regarding a response date to the complaint and related issues; now therefore:

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel, that:

1. The Defendants moved to dismiss the Trustee’s Complaint on February 10, 2022.
2. The Trustee shall respond to the motion to dismiss by June 15, 2022.
3. Defendants shall file their reply by July 15, 2022.
4. The Parties shall seek oral argument on the motion at the Court’s convenience after all briefing is complete.
5. As previously stipulated, Counsel for the Defendants accepted service of the Complaint and the Defendants waive any defense in this action based on insufficiency of process or insufficiency of service of process.
6. Except as expressly set forth herein, the Trustee and Defendants reserve all rights, arguments, objections and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect any such rights, arguments, objections, and defenses, including, without limitation, challenges to personal jurisdiction or to the jurisdiction of this Court.
7. Nothing in this Stipulation is a waiver of the Parties’ right to request from the Court a further extension of time.

8. A signed facsimile or electronic copy of this Stipulation shall be deemed an original.

Dated: March 3, 2022
New York, New York

By: /s/ David J. Sheehan
BAKER & HOSTETLER LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Tracy L. Cole
Email: tcole@bakerlaw.com
Ganesh Krishna
Email: gkrishna@bakerlaw.com
Keith R. Murphy
Email: kmurphy@bakerlaw.com
Fernando A. Bohorquez
Email: fbohorquez@bakerlaw.com
Michelle N. Tanney
Email: mtanney@bakerlaw.com

By: /s/ Emil A. Kleinhaus
WACHTELL, LIPTON, ROSEN & KATZ
51 West 52nd Street
New York, NY 10019
Telephone: (212) 403-1000
Facsimile: (212) 403-2000
Emil A. Kleinhaus
Email: EAKleinhaus@wlrk.com
Michael H. Cassel
Email: MHCassel@wlrk.com

Attorneys for Defendants

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC, and the Chapter 7 Estate of Bernard L.
Madoff*

SO ORDERED.

Dated: March 4, 2022
Poughkeepsie, New York



/s/ Cecelia G. Morris

Hon. Cecelia G. Morris
U.S. Bankruptcy Judge